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Counsel to the Official Committee of Tort Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company

☒ Affects both Debtors

**All papers shall be filed in the Lead
Case, No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**JOINDER OF THE OFFICIAL COMMITTEE
OF TORT CLAIMANTS IN THE DEBTORS'
MOTION PURSUANT TO 11 U.S.C. §§ 363(b)
AND 105(a) AND FED. R. BANKR. P. 9019
FOR ENTRY OF AN ORDER (I) APPROVING
SETTLEMENTS WITH FEDERAL AND
STATE AGENCIES OF GOVERNMENTAL
AGENCY FIRE CLAIMS, AND (II)
GRANTING RELATED RELIEF (THE
"GOVERNMENTAL FIRE CLAIMS
SETTLEMENTS MOTION") (Relates to Dkt.
No. 6940)**

Date: May 12, 2020
Time: 10:00 a.m. (Pacific Time)
Place: Telephonic Appearance Only
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: May 9, 2020

1 The Official Committee of Tort Claimants (the “**TCC**”), representing the largest group of
2 stakeholders in the jointly administered bankruptcy cases (the “**Chapter 11 Cases**”) of PG&E
3 Corporation and Pacific Gas and Electric Company (the “**Debtors**”), by and through its attorneys
4 Baker & Hostetler LLP, hereby submits this joinder (the “**Joinder**”) to the Debtors’ Motion
5 Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 for Entry of an Order
6 (I) Approving Settlements with Federal and State Agencies of Governmental Agency Fire Claims,
7 and (II) Granting Related Relief (the “**Governmental Fire Claims Settlements Motion**”) (Dkt.
8 No. 6940). The TCC actively negotiated the terms of the settlements which provide for the
9 (1) reduction or withdrawal of billions of dollars of federal and state governmental agencies’ fire
10 claims, (2) prioritization of tort claimants’ claims over the claims of the settling governmental
11 agencies, (3) waiver of potential claims against fire victims and the fire victim trust, and (4) limit
12 the source of recovery for certain settled claims.

13 The TCC reserves all rights to be heard by the Court in connection with the Governmental
14 Fire Claims Settlements Motion, and to amend, supplement, or otherwise modify this Joinder prior
15 to or at the hearing on the Governmental Fire Claims Settlements Motion.

16 WHEREFORE, the TCC respectfully requests that the Court enter an order granting the
17 Governmental Fire Claims Settlements Motion and granting such other and further relief as is just
18 and proper.

19
20 Dated: May 8, 2020

Respectfully submitted

21 BAKER & HOSTETLER LLP

22 By: /s/ Eric R. Goodman
23 Eric R. Goodman

24 *Counsel to the Official Committee of Tort*
25 *Claimants*